



Federal Communications Commission
Washington, D.C. 20554

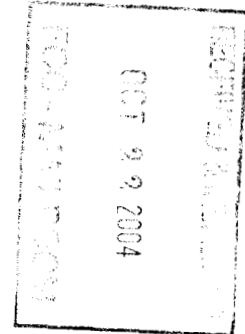
040203
Imaging letter

October 20, 2004

Richard L. Plessinger, Sr.
35 Island Drive #16
Eastpoint, Florida 32328

Mark N. Lipp, Esq.
Scott Woodworth, Esq.
1455 Pennsylvania Ave., NW
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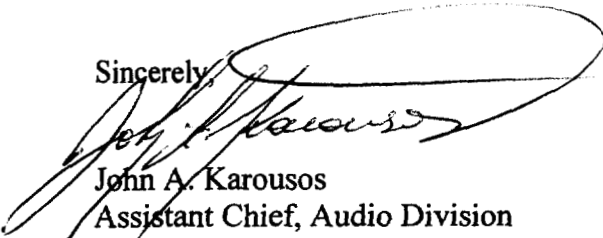
In re: Petition for Rulemaking for Amelia and Ripley, Ohio

Dear Messrs. Plessinger, Lipp and Woodworth:

This is in reference to the Petition for Rulemaking you filed proposing to substitute Channel 258A for Channel 258C3 at Ripley, Ohio, and reallot Channel 258A from Ripley to Amelia, Ohio, as the community's first local aural transmission service, and modify the license for Station WAOL(FM), to reflect the changes.

We are returning your petition for rulemaking. Your petition proposes to remove the sole local aural transmission service from the community of Ripley and does not request a waiver of the prohibition on the removal of sole local aural transmission service. *See Change of Community MO&O*, 5 FCC Rcd 7094 (1990) *affirming* 4 FCC Rcd 4870 (1989). Rather, you argue that your petition is not proposing to remove the sole local service from Ripley because Quorum Radio Partners, licensee of Station KELE(AM) Mountain Grove, Missouri has filed a major change application (File No. BMJP-20040130APT) to change its community of license to specify Ripley, Ohio as its community of license. That application is mutually exclusive with another application, which makes a non-routine matter and its resolution will take some time. As such, your petition is unacceptable for consideration because it is contingent on the future grant of Station KELE's application on file. For the reasons stated above, we are returning your petition for rulemaking. You may refile your petition once Station KELE(AM) is licensed at Ripley.

Sincerely,


John A. Karousos
Assistant Chief, Audio Division
Media Bureau

Enclosure

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

MAR 23 2004

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Ripley and
Amelia, Ohio)

)
) MB Docket No. _____
) RM - _____
)
)

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

PETITION FOR RULE MAKING

Richard L. Plessinger, Sr. ("Plessinger"), licensee of WAOL(FM), Ripley, Ohio hereby submits this Petition for Rule Making, which proposes to delete Channel 258C3 at Ripley, Ohio and allot Channel 258A at Amelia, Ohio as that community's first local service. If this Petition is granted, Plessinger will file an application for Channel 258A at Amelia and construct the facilities as authorized. The following table summarizes the changes requested in this Petition:

City	Channel	
	Existing	Proposed
Ripley, Ohio	258C3	--
Amelia, Ohio	---	258A

I. Technical Analysis

1. As demonstrated in the Technical Exhibit, Channel 258A can be allotted to Amelia at coordinates of 38-55-47 North Latitude, 84-07-07 West Longitude consistent with Section 73.207 of the Commission's Rules with respect to all existing and proposed domestic allotments and facilities. See Technical Exhibit, Figure 1. A 70 dBu signal can be provided to

Amelia from the proposed reference coordinates. See Technical Exhibit, Figure 2. The relocation of WAOL from Ripley to Amelia will result in a predicted net gain in population of 94,132 persons within the proposed WAOL 60 dBu contour. See Technical Exhibit, Figure 6. The entire loss area will continue to receive at least 5 other aural services, and will thus remain well served.

II. Change in Community of License

2. Plessinger desires to change the community of license of WAOL from Ripley to Amelia under the guidelines set forth in *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *recons. granted in part*, 5 FCC Rcd 7094 (1990). There, the Commission stated that a station may change its community of license without subjecting the license to other expressions of interest if (1) the proposed allotment is mutually exclusive with the current allotment; (2) the current community of license will not be deprived of its only local service; and (3) the proposed arrangement of allotments is preferred under the Commission's allotment priorities. These criteria are met here. First, the proposed use of Channel 258A at Amelia is mutually exclusive with the current use of Channel 258C3 at Ripley. See Technical Exhibit. Second, Ripley will not be deprived of its only local service because, as discussed in Paragraph 5 herein, Quorum Radio Partners, Inc., licensee of Station KELE(AM), Mountain Grove, Missouri has filed a major change application to change its city of license from Mountain Grove to Ripley. See BMJP-20040130APT. Third, the provision of a first local service at Amelia (2000 U.S. Census population 2,752) under Priority 3 will result in a preferential arrangement of allotments over the retention of a second local service at Ripley (2000 U.S. Census population 1,745) under Priority 4. See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982).

3. Amelia is located in the Cincinnati, Ohio Urbanized Area. Therefore, this relocation implicates the Commission's policy regarding the migration of stations into urban areas. See *Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995) ("*Headland*"); *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) ("*Tuck*"). In making the determination whether to award an urbanized community a first local service preference, the Commission will consider the extent to which the station will provide service to the entire Urbanized Area, the relative populations and proximity of the suburban and central city, and, most importantly, the independence of the suburban community. *Tuck*, 3 FCC Rcd at 5377-78. In this case, from the proposed transmitter site, WAOL would place a 70 dBu contour over less than 50% of the Cincinnati Urbanized Area. Amelia's population (2000 U.S. Census 2,752) is less than 1% of that of Cincinnati (2000 U.S. Census 331,285), and Amelia is located 25.5 kilometers from Cincinnati. These figures are similar to those of other suburban communities granted a first local preference. See e.g., *Park City, Montana*, DA 04-285 (2004) (Park City's population is less than 1% of that of Billings, and Park City is located 21 miles from Billings); *Ada, Newcastle and Watonga, Oklahoma*, 11 FCC Rcd 16896, 16899 (1996) (Newcastle's population is less than 1% of that of Oklahoma City, and Newcastle is located 15 miles from Oklahoma City). Nevertheless, the Commission has repeatedly stated that these factors are less important than evidence of independence. See *Headland*, 10 FCC Rcd at 10355. The following analysis of the eight *Tuck* factors demonstrates the independence of Amelia from Cincinnati.

(1) *Extent to which the residents of Amelia work in Amelia.* According to 2000 Census figures, 82 of the 1,446 employed individuals in Amelia, or 6%, work at their place of residence. See Exhibit 2. As shown below, there are many employers in Amelia who provide ample opportunities for Amelia residents to be employed in Amelia

and not in Cincinnati. This alleviates any concerns that Amelia is dependent on Cincinnati for the employment of its residents. *See Lebanon and Speedway, Indiana*, 17 FCC Rcd 25064, 25065 (2002).

(2) *Newspapers and other media that cover Amelia's local needs and interests.* *The Clermont Community Journal* and *The Clermont Sun* are weekly publications that cover the local needs and interests of Amelia. *The Clermont Community Journal* contains a separate section on Amelia that includes the local news report and the weekly police report. There are over 17 rack locations across Amelia where the residents of Amelia can purchase the newspaper. In addition to the services of two regional newspapers, Amelia maintains its own webpage at <<http://www.ameliavillage.org>> that enables the residents of Amelia to access a wide variety of information concerning Amelia, including information regarding city officials, public and city services, public and committee meetings, and community events. *See Exhibit 2.*

(3) *Community leaders and residents perceive Amelia as being separate from Cincinnati.* Amelia has its own unique identity and history that is separate from that of Cincinnati. Amelia is located in Clermont County and is named after Amelia Bowdoin, the wife of the town's tollgate keeper. Early settlers arrived in what today is Amelia in the early 1800s and named the town Mill Town. The name was soon changed to Milton, and then in 1836 it was again changed to Amelia with the establishment of the first post office. Amelia was incorporated on December 20, 1900. The present day Mayor of Amelia is Mark Menz who has lived in Amelia with his family since 1988. Mayor Menz characterizes Amelia as "a fast growing and vibrant community with a lot of potential for the future." *See Exhibit 2.*

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(4) *Amelia has its own local government and elected officials.* The Village of Amelia operates independently of any other government, and is run by the mayor and village council. The Council is composed of six members elected in an at-large, staggered election held every two years. Each Council member is elected to a four year term. The Mayor, also elected to a four year term, is the chief executive officer of Amelia and is responsible for administering the laws adopted by the Council. The Mayor also appoints all Village Personnel with the confirmation of the Council. The Council's primary responsibilities are legislative – they establish the laws and rules of Amelia and determine how money is spent. Each Council member is represented on a number of commissions including the planning commission, recreation commission, and historical society. These commissions must meet monthly and make recommendations to the Council on specific projects assigned to that commission. In addition, the members of the Council are assigned by the Mayor to chair a committee –either the finance, public safety, or public services committee- during January of each year. *See Exhibit 2.*

Amelia currently employs 8 full-time employees and 10 part-time employees. Amelia does not impose any income tax on its residents, but does impose a property tax. The residents of Amelia are encouraged to apply for appointment to any of the Amelia's boards and commissions. Amelia also provides its residents with a number of parks and greenspace, including the Robert H. Groh Community Park and the Spencer Shank Memorial Park. *See Exhibit 2.*

(5) *There is one zip code reserved exclusively for Amelia and Amelia provides government phone listings on the web.* The zip code designated exclusively for Amelia is 45102, and the U.S. Postal Service operates five post offices in Amelia. The

government of Amelia provides an extensive listing of all government phone numbers on the Amelia website. The residents of Amelia can use these numbers to contact any individual, board or commission in Amelia, and to find out information about the services provided by Amelia. *See Exhibit 2.*

(6) *Amelia has its own commercial establishments and health facilities.*

Amelia is home to a variety of businesses and commercial establishments. The Amelia Business Association provides a listing of businesses located in Amelia and serving the community of Amelia. A number of local businesses identify with the community by using "Amelia" in their name, including Amelia Discount Carpet, Amelia Florist, Amelia Locksmiths, and Amelia Pet Clinic. Other Amelia retail and commercial businesses include Bard Nurseries, Campbell & Associates Insurance, DeWeese Upholstery, Eagle Coach Company, Golden Rule Catering, Hurst Printing, Luke's Sewing Center, Terry's Carpet Plus, and Red Dog Salon. Dining establishments in Amelia include Abbott's Family Restaurant, Bob's Pizza, Grammas Pizza, Dairy Queen, Franke's Drive-In, and Penn Station East Coast Subs. Banks located in Amelia include the First Clermont Bank, New Richmond National Bank, Bank One, and Fifth Third. *See Exhibit 2.*

A number of health care providers are located in Amelia. Medical services and dental services are provided by a number of sole practitioners. Amelia is home to two pharmacies, CVS and Kroger, where residents can get their prescriptions filled. Chiropractic care is provided by Ohio Pike Chiropractic and Weadick Chiropractic. Amelia is also home to a number of religious organizations, such as Amelia United Methodist, Central Baptist, First Baptist, and Ohio Pike Church of God. Community organizations in Amelia include, the Amelia Area Historical Society, the American

Legion, the Amelia Knothole Baseball Association, and the Amelia Youth Athletic Association. Community activities and events that occur in Amelia include the Village Easter Egg Hunt, the Village Wide Yard Sale, the Summer Yards Award, the Classic Car Show, and the Citizen of the Year Award. See Exhibit 2.

(7) *Amelia is a separate and distinct advertising market from Cincinnati.* The Clermont Community Journal and The Clermont Sun provide the businesses of Amelia with a place to advertise to the residents of Amelia without relying on Cincinnati. The Clermont Community Journal provides advertising space in the hardcopy versions of its paper and on its websites. See Exhibit 2.

(8) *Amelia has its own schools, libraries, police protection and fire protection.* The West Clermont School District serves the residents of Amelia with the following schools located in Amelia: Amelia Elementary, Amelia Middle School, Amelia High School, McNicholas High School, and St. Bernadette School. The Clermont Country Public Library system has a branch in Amelia. The Amelia Branch location is open six days a week and provides the residents of Amelia with traditional library services. See Exhibit 2.

Police services are provided to the residents of Amelia by the Village of Amelia Police Department and fire services are provided by the B.M.O.P. Fire Department, which maintains a station in Amelia. The Village of Amelia Police Department employs 10 officers and its mission is to work in partnership with the community to provide a safe and secure environment. The B.M.O.P Fire Department is a regional fire department that the Village of Amelia contracts with to provide fire and paramedic services to the community of Amelia. See Exhibit 2.

4. Amelia is clearly independent of Cincinnati and therefore deserving of a first local service. Plessinger reiterates that if the Commission allots Channel 258A at Amelia as that community's first local service, he will file an application for Channel 258A at Amelia and will construct the facilities as authorized.

III. Station KELE, Mountain Grove, Missouri to Ripley, Ohio

5. In order to allot Channel 258A to Amelia, local service must be maintained at Ripley. For that reason, on January 30, 2004, Quorum Radio Partners, Inc. ("Quorum"), licensee of Station KELE(AM) filed a major change application with the Commission to change the community of license of Station KELE from Mountain Grove, Missouri to Ripley, Ohio. *See* BMJP-20040130APT. If the Quorum application is granted by the Commission, Ripley will be served by KELE and thereby not deprived of its only local service. Therefore, Plessinger requests that the Commission consider this Petition in conjunction with the Quorum application.

6. There is precedent for the Commission to consider a petition for rule making in conjunction with a major change application. *See Marion and Johnston City, Illinois*, 18 FCC Rcd 15346 (2003) ("*Marion*"). In that case, Clear Channel Broadcasting Licenses, Inc. ("Clear Channel") filed a major change application with the Commission to change the community of license of WHITE(AM) from Johnston City, Illinois to Berwyn, Illinois (the "Clear Channel Application"). In order to ensure that this relocation did not deprive Johnston City of local service, Clear Channel filed a petition for rule making requesting to change the community of license of WDDD-FM from Marion, Illinois to Johnston City, Illinois. In *Marion*, the Commission granted Clear Channel's request to change the community of license of WDDD-FM from Marion, Illinois to Johnston City, Illinois stating that "the Commission routinely allows allotment 'backfills' by existing stations to preserve local service." *Id* at 15348. In a separate

action, taken on the same day, the Commission granted the Clear Channel Application to change the community of license of WHITE(AM) from Johnston City, Illinois to Berwyn, Illinois. See BMAP-20010719AAN. These two proceedings were coordinated and granted at the same time specifically to avoid depriving a community of its only local service where the overall arrangement was found to be in the public interest.

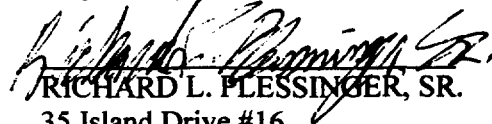
7. Here, the Commission is faced with the same situation. In order to provide Amelia with first local service, this Petition and the Quorum application need to be considered in conjunction with each other to ensure that the community of Ripley will not be deprived of its only local service. In that regard, Quorum specifically filed to serve Ripley pursuant to a contractual understanding with Plessinger. Thus, Quorum is committed to serving Ripley and desires to have its application coordinated with this FM proceeding. Attached as Exhibit 3 is Quorum's statement to the foregoing.

IV. CONCLUSION

For the foregoing reasons the Commission should delete Channel 258C3 at Ripley, Ohio and allot Channel 258A at Amelia, Ohio as that community's first local service. Plessinger reiterates that if the Commission allots Channel 258A at Amelia as that community's first local service, he will file an application for Channel 258A at Amelia and will construct the facilities as authorized. The Commission should promptly issue a Notice of Proposed Rule Making as described herein.

I verify that the factual information
contained herein is true to the best of my
knowledge, information and belief.

Respectfully submitted,


RICHARD L. FLESSINGER, SR.

35 Island Drive #16
Eastpoint, FL 32328
513-218-1843

Of Counsel:

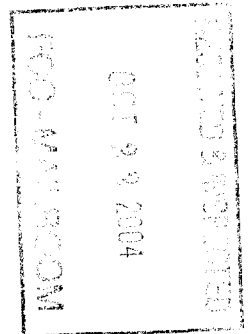
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March 17, 2004

TECHNICAL EXHIBIT

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS
RIPLEY AND AMELIA, OHIO

Technical Narrative



This technical narrative and associated exhibits have been prepared on behalf of FM station WAOL (herein "Petitioner") in support of a Petition for Rule Making ("Petition") to amend Section 73.202(b) by the reallotment of channel 258C3 (99.5 MHz) from Ripley, Ohio to Amelia, Ohio, reclassification from Class C3 to Class A and the modification of the license (BLH-20021101ABS) of WAOL on channel 258C3 at Ripley, Ohio, accordingly. As the requested change is mutually exclusive with the allotment of channel 258C3 at Ripley, Petitioner invokes the provisions of Section 1.420(i).

The following is a summary of the reallotment proposal:

- The community of Amelia, Ohio (2000 Census population 2,752) will be provided with its first local aural transmission service.
- The proposal will not remove the only local service at Ripley, Ohio (2000 population 1,745) as Class D AM station KELE at Mountain Grove, Missouri (2000 Census population 4,574 persons) has filed a major change application to change its city of license from Mountain Grove to Ripley. Mountain Grove will not be deprived of its sole local service as FM station KELE is currently licensed to operate on channel 293A at Mountain Grove.
- Although Amelia is located within the Cincinnati, OH-KY-IN Urbanized Area as defined by the 2000 U.S. Census, as detailed elsewhere in this Petition it is believed that Amelia warrants a first local service preference.
- The number of persons within the 1 mV/m contour will increase from 117,208 persons to 211,340 persons, and there will be a "net" increase in 1 mV/m coverage of 94,132 persons.
- The loss area is considered to be "well-served".

Proposed Change in Table of Allotments

The Petitioner is currently licensed (BLH-20021101ABS) to operate on channel 258C3 at Ripley, Ohio with an effective radiated power (ERP) of 13 kW and an antenna height above average terrain (HAAT) of 140 meters.

Ripley, is located in Brown County, Ohio and has a 2000 U.S. Census population of 1,745 persons. Ripley currently has no other local FM or AM services. However, the proposal will not remove the only local service at Ripley as licensed Class D AM station KELE at Mountain Grove, Missouri (2000 Census population 4,574 persons) has filed a major change application to change its city of license from Mountain Grove to Ripley. Furthermore, Mountain Grove will not be deprived of its sole local service as FM station KELE is currently licensed to operate on channel 293A at Mountain Grove (BMLH-19890327KC). Therefore, adoption of the proposal will not deprive Ripley of its sole "existing" local aural service.

Amelia is located in Clermont County, Ohio and has a 2000 U.S. Census population of 2,752 persons. Amelia has no local FM or AM service and, therefore, Petitioner's proposal would bring a first local aural broadcast service to Amelia. Accordingly, Petitioner requests modification of the FM allocation table as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Ripley, Ohio	258C3	--
Amelia, Ohio	--	258A

Compliance With FCC Rules

The attached Figure 1 is a tabulation of required separations pertinent to use of channel 258A at Amelia. The reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 of the

FCC's rules to all existing, authorized and proposed stations and allotments.¹

Figure 2 is a map which depicts the city coverage (70 dBu) contour based on operation with maximum Class A allotment facilities (ERP 6 kW/HAAT 100 m) from the allotment reference site. As shown, all (100%) of Amelia is located within the 70 dBu contour. The Amelia city limits shown on Figure 2 were obtained from a map contained in the 2000 U.S. Census of Population.

Urbanized Area Considerations

Ripley is not located within an Urbanized Area. Amelia is located within the Cincinnati, OH-KY-IN Urbanized Area. The 70 dBu contour for the present and proposed WAOL operations will encompass less than 50% of the land area of any Urbanized Area. Furthermore, the reference point of Amelia is located approximately 25.5 kilometers southeast of the reference point of Cincinnati.²

Gain and Loss Areas and Available Aural Services

Figure 3, attached, is a map showing the FM 1 mV/m primary service contours for the licensed operation on channel 258C3 at Ripley and the proposed operation on channel 258A at Amelia. Maximum facilities and uniform terrain were used to determine contour locations. The 1 mV/m "gain" and "loss" areas are also indicated.

Figure 4, attached, shows the other aural (AM, FM) reception services available within the FM 1 mV/m primary service contours of the licensed channel 258C3 and proposed

¹ The geographic coordinates for channel 258A at Amelia, Ohio are 38°55'47" North Latitude, 84°07'07" West Longitude.

² The Amelia reference point is located at N39°01'42", W84°13'04" and the Cincinnati reference point is located at N39°09'43" North Latitude, 84°27'25" West Longitude based on the Geographic Names and Information System (GNIS) database.

channel 258A operations.³ For FM stations the 1 mV/m contour is shown and for AM stations, the nighttime-interference-free (NIF) contour is shown. Figure 5 tabulates the AM and FM stations whose contours are shown on Figure 4. The call letters on Figure 4 identify the AM and FM service contours of stations tabulated on Figure 5. Only those AM and FM services necessary to provide at least five (5) fulltime aural services to the gain and loss areas have been shown on Figure 4. There are at least 5 other services available to the gain and loss areas and, thus, these areas are considered to be well-served.

Figure 6 is a tabulation of the results of the reception service analysis for the gain and loss areas. The loss area contains 70,611 persons and the gain area contains 164,743 persons, for a "net" gain of 94,132 persons.

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of Section 73.313, except that uniform terrain was presumed in all directions.

Population and Area

The population within each FM primary service contour (1 mV/m), gain and loss area, and reception area was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid was within each service area. The area within each FM primary service contour was calculated using a root mean square algorithm.

Conclusion

Channel 258C3 can be reallocated from Ripley, Ohio to Amelia, Ohio and reclassified from Class C3 to Class A in

³ The determination of available reception services was based on the criteria set forth in footnote 1 of the Notice of Proposed Rule Making in MM Docket No. 96-219 (DA 96-1774; adopted October 25, 1996, released November 1, 1996).

compliance with all applicable Commission Rules and International Agreements. The community of Amelia will be provided with a first local aural transmission service. The proposal will not remove the only local service at Ripley as Class D AM station KELE at Mountain Grove, Missouri has filed a major change application to change its city of license from Mountain Grove to Ripley. Furthermore, Mountain Grove will not be deprived of its sole local service as FM station KELE is currently licensed to operate on channel 293A at Mountain Grove. The number of persons within the 1 mV/m contour will increase from 117,208 persons to 211,340 persons, and there will be a "net" increase in 1 mV/m coverage of 94,132 persons. The loss area is considered to be well-served. Therefore, Petitioner requests the reallocation of channel 258C3 from Ripley to Amelia, Ohio, reclassification from Class C3 to Class A and the modification of the license for WAOL on channel 258C3 at Ripley, BLH-20021101ABS, accordingly.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237-6019
(941)329-6000
JEFF@DLR.COM

March 2, 2004

Figure 1

CDBS FM SEPARATION STUDY

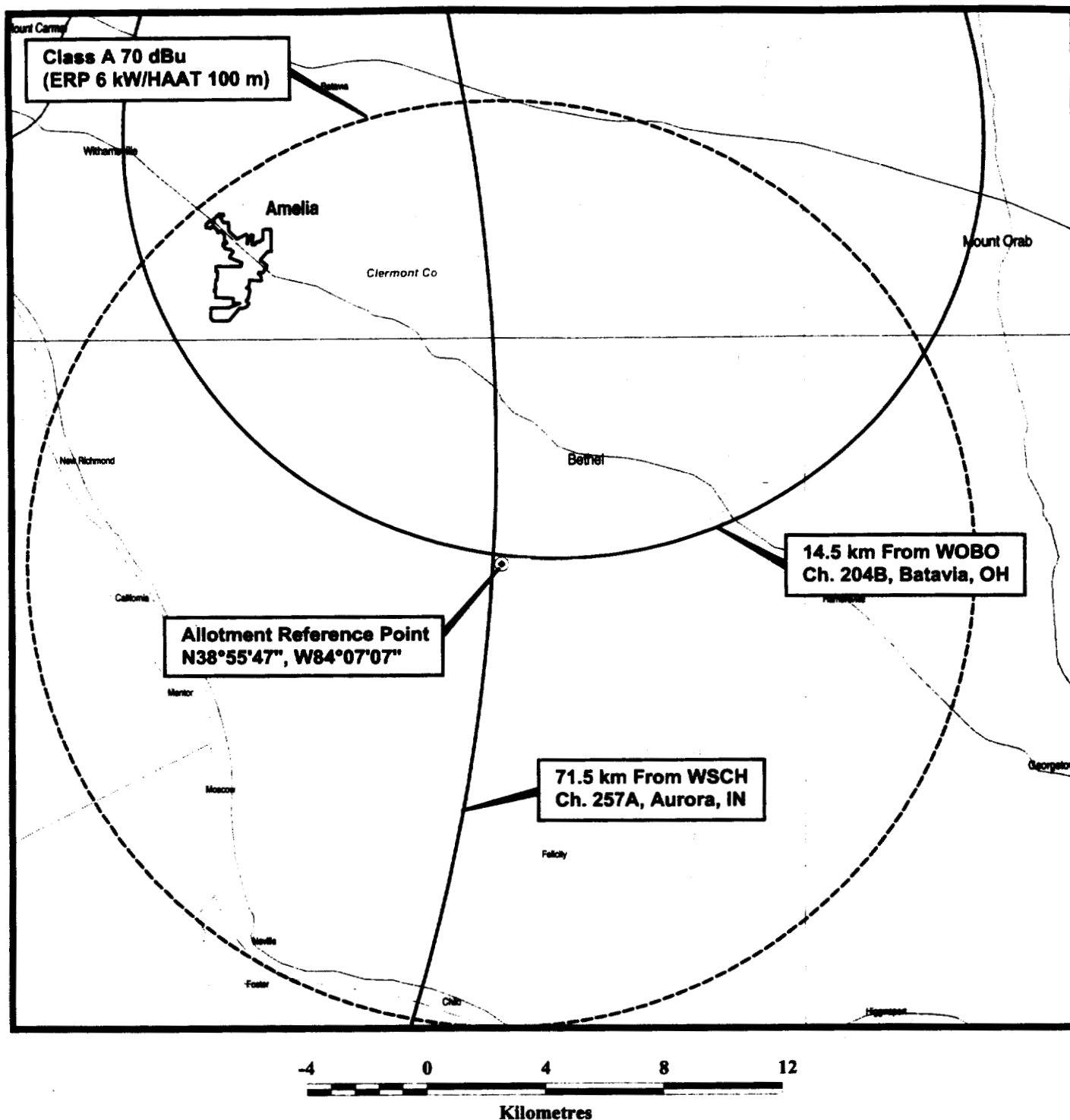
Job Title: Proposed WAOL, Ch. 258A, Amelia, OH
 Channel: 258 A

Separation Buffer: 32 km
 Coordinates: 385547 840707

Call Id	City St	Status	File Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km) 215 207	
WOBO 71288	BATAVIA OH	LIC C	BLED 19880202KB	204 B 88.7	15.500 142	Y 13840	39-03-43 084-05-50	N	7.2	14.79 -0.21	0.0 Close	15.0
WHKO 14245	DAYTON OH	LIC C	BMLH 20010810AAV	256 B 99.1	50.000 325	N	39-44-02 084-14-53	N	352.9	89.97 20.97	63.0 Clear	69.0
WSCH 16256	AURORA IN	LIC C	BLH 19891117KB	257 A 99.3	1.150 160	N	38-57-55 084-56-51	N	273.4	71.97 -0.03	49.0 Close	72.0
WNXT-F 62329	PORTSMOUTH OH	LIC C	BLH 19940111KE	257 A 99.3	2.550 156	N	38-43-22 082-59-56	N	103.0	99.91 27.91	49.0 Clear	72.0
WAOL 56226	RIPLEY OH	LIC C	BLH 20021101ABS	258 C3 99.5	13.000 140	N	38-38-55 084-00-42	N	163.5	32.56 -109.44	119.0 Short ¹	142.0
WZPL 47144	GREENFIELD IN	LIC C	BLH 20020905AAG	258 B 99.5	19.000 236	N	39-45-36 086-00-22	N	300.2	187.01 9.01	143.0 Close	178.0
WZPL 47144	GREENFIELD IN	CP C	BPH 20020416AAF	258 B 99.5	19.000 236	N	39-45-36 086-00-22	N	300.2	187.01 9.01	143.0 Close	178.0
WLQT 55500	KETTERING OH	LIC C	BLH 20020823AAP	260 B 99.9	28.000 200	N	39-43-19 084-12-36	N	354.9	88.30 19.30	63.0 Clear	69.0

¹ Existing WAOL site. Requested reallocation of channel 258A to Amelia, OH is mutually exclusive with Petitioner's current channel 258C3 allotment at Ripley, OH.

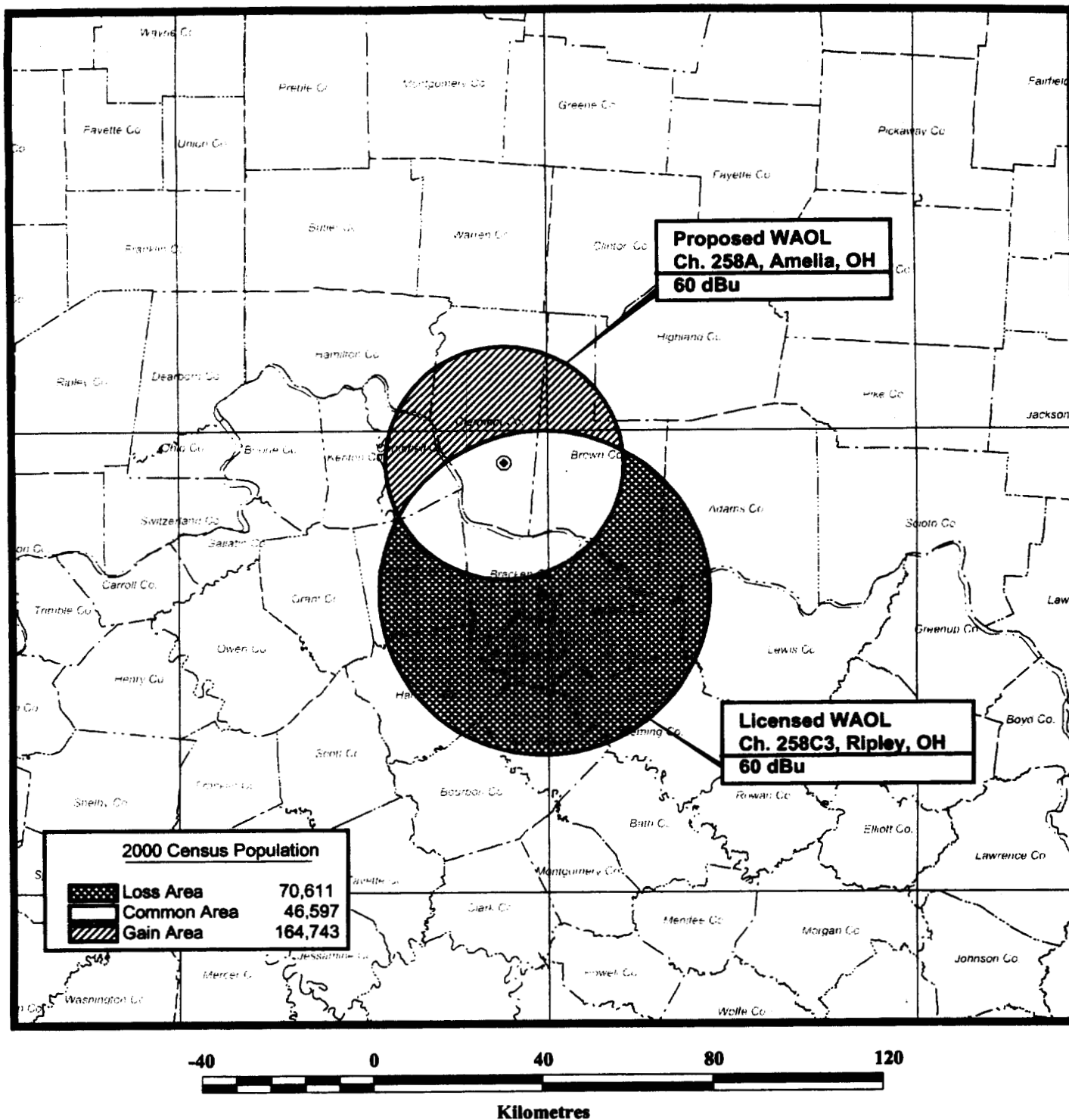
Figure 2



AREA-TO-LOCATE

CHANNEL 258A
AMELIA, OHIO

Figure 3

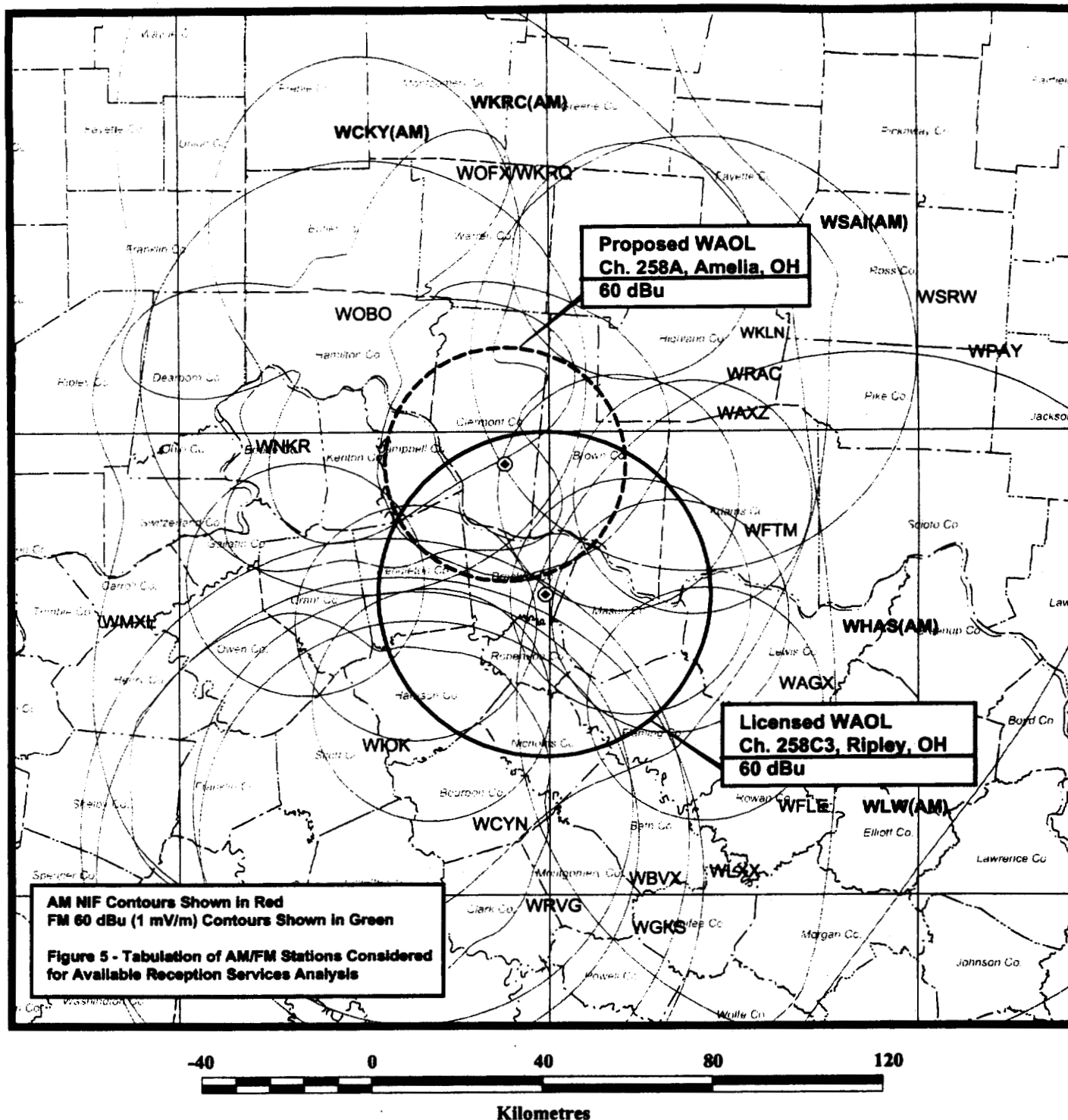


60 DBU GAIN/LOSS AREAS

CHANNEL 258A
AMELIA, OHIO

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 4



OTHER AVAILABLE SERVICES

CHANNEL 258A
AMELIA, OHIO

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 5

STATION WAOL
CHANNEL 258A
AMELIA, OHIO

RADIO STATIONS CONSIDERED FOR
AVAILABLE RECEPTION SERVICES ANALYSIS

I. FM Stations

<u>Call Sign</u>	<u>Channel #</u>	<u>City</u>	<u>State</u>	<u>ERP</u>	<u>HAAT</u>
WFTM	240A	Maysville	KY	3	94
WAXZ	249A	Georgetown	OH	2.1	118
WAGX	267A	Manchester	OH	3	91
WIOK	298A	Falmouth	KY	1.35	212
WCYN	272A	Cynthiana	KY	3.4	122
WRAC	276A	West Union	OH	3.3	130
WFLE	236A	Flemingsburg	KY	2.35	161
WOBO	204B	Batavia	OH	15.5	142
WNKR	293A	Williamstown	KY	1.4	145
WBVX	221C2	Carlisle	KY	32	186
WGKS	245C2	Paris	KY	50	150
WOFX	223B	Cincinnati	OH	16	264
WKRQ	270B	Cincinnati	OH	16	264
WSRW	294B	Hillsboro	OH	50	75
WRVG	210C2	Georgetown	KY	50	125
WMXL	233C1	Lexington	KY	100	194
WLXX	225C1	Lexington	KY	100	259
WKLN	272A	Wilmington	OH	3	91
WPAY(CP)	281C	Portsmouth	OH	100	451

II. AM Stations

<u>Call Sign</u>	<u>Frequency</u>	<u>City</u>	<u>State</u>	<u>Authorized Facilities</u>
WLW	700	Cincinnati	OH	50 kW-U, ND
WHAS	840	Louisville	KY	50 kW U, ND
WSAI	1530	Cincinnati	OH	50 kW-U, DA-N
WKRC	550	Cincinnati	OH	1 kW-N, DA-2
WCKY	1360	Cincinnati	OH	5 kW-U, DA-N

Figure 6

**STATION WAOL
CHANNEL 258A
AMELIA, OHIO**

**Tabulation of Areas, Populations
And Reception Services Within 1 mV/m Coverage Contours**

I. Population and Land Area Within 1 mV/m Contours

Facilities	Within 1 mV/m Contour	
	2000 Census Population	Area (km2)
Licensed Ch 258C3 Ripley, OH	117,208	4,778
Proposed Ch 258A Williamsburg, OH	211,340	2,516

II. Population and Land Area Within Gain and Loss Areas

Area	Within 1 mV/m Contour	
	2000 Census Population	Area (km2)
Gain	164,743	1,132
Loss	70,611	3,391
"Net" Gain	94,132	-2,259

III. Available Reception Services Within Gain and Loss Areas

Area	No. of Services	Within 1 mV/m Contour	
		2000 Census Population	Area (km2)
Gain	5 or more	164,743	1,132

Area	No. of Services	Within 1 mV/m Contour	
		2000 Census Population	Area (km2)
Loss	5 or more	70,611	3,391

EXHIBIT 2



U.S. Census Bureau

American FactFinder

FACT SHEET

Amelia village, Ohio

Highlights from the Census 2000 Demographic Profiles:

General Characteristics - show more >>					
	Number	Percent	U.S.		
Total population	2,752	100.0	100%	map	brief
Male	1,296	47.1	49.1%	map	brief
Female	1,456	52.9	50.9%	map	brief
Median Age (years)	29.1	(X)	35.3	map	brief
Under 5 years	290	10.5	6.8%	map	
18 years and over	1,968	71.5	74.3%		
65 years and over	210	7.6	12.4%	map	brief
One race - Total	2,709	98.4	97.6%		
White	2,663	96.8	75.1%	map	brief
Black or African American	16	0.6	12.3%	map	brief
American Indian and Alaska Native	2	0.1	0.9%	map	brief
Asian	8	0.3	3.6%	map	brief
Native Hawaiian and Other Pacific Islander	0	0.0	0.1%	map	brief
Some other race	20	0.7	5.5%	map	
Two or more races	43	1.6	2.4%	map	brief
Hispanic or Latino (of any race)	35	1.3	12.5%	map	brief
Average household size	2.59	(X)	2.59	map	brief
Average family size	3.10	(X)	3.14	map	
Total housing units	1,112	100.0	100.0%	map	
Occupied housing units	1,063	95.6	91.0%		brief
Owner-occupied housing units	578	54.4	66.2%	map	
Renter-occupied housing units	485	45.6	33.8%	map	brief
Vacant housing units	49	4.4	9.0%	map	
Social Characteristics - show more >>					
	Number	Percent	U.S.		
Population 25 years and over	1,690	100.0			
High school graduate or higher	1,411	83.5	80.4%	map	brief
Bachelor's degree or higher	187	13.8	24.4%	map	
Civilian veterans (civilian population 25 years and older)	233	11.8	12.7%	map	brief
Disability Status (population 21 to 64 years)	318	19.1	19.2%	map	brief
Foreign Born	51	1.9	11.1%	map	brief
Now Married (population 15 years and over)	1,221	58.1	54.4%		brief
Speak a language other than English at home (5 years and older)	91	3.7	17.9%	map	brief
Economic Characteristics - show more >>					
	Number	Percent	U.S.		
In Labor Force (16 years and older)	1,561	74.8	63.9%		brief
Mean travel time to work in minutes (16 years and older)	30.3	(X)	25.5	map	
Median household income (dollars)	44,900	(X)	41,994	map	
Median family income (dollars)	51,699	(X)	50,046	map	
Per capita income (dollars)	17,772	(X)	21,857	map	
Families below poverty level	38	5.0	9.2%	map	brief
Individuals below poverty level	206	7.6	12.4%	map	
Housing Characteristics - show more >>					
	Number	Percent	U.S.		
Single-family owner-occupied homes	534	100.0			
Median value (dollars)	111,300	(X)	119,600	map	brief
Median of selected monthly owner costs	(X)	(X)			
With a mortgage	978	(X)	1,088	map	
Not mortgaged	266	(X)	295		